

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF DAVID J. STANOCH IN SUPPORT OF
PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE OPINIONS OF
DEFENSE EXPERT TIMOTHY ANDERSON**

I, **David J. Stanoch**, hereby certifies as follows:

1. I am an attorney at law licensed to practice in the State of New Jersey and admitted to the District of New Jersey. I am an attorney with Kanner & Whiteley, L.L.C. and serve as liaison counsel to the plaintiffs' side in this matter. I am familiar with the facts and circumstances of these actions. I make this certification in support of Plaintiffs' *Daubert* Motion to Preclude Opinions of Defense Expert Timothy Anderson.
2. Attached hereto as Exhibit 1 is a true and correct copy of Timothy Anderson's December 19, 2022 report in this matter.
3. Attached hereto as Exhibit 2 is a true and correct copy of the transcript of Timothy Anderson's February 9, 2023 deposition in this matter.

4. Attached hereto as Exhibit 3 is a true and correct copy of the transcript of Timothy Anderson's March 9, 2022 deposition in this matter.
5. Attached hereto as Exhibit 4 is a true and correct copy of the FDA's November 29, 2018 Warning Letter to Zhejiang Huahai Pharmaceutical Co., Ltd.
6. Attached hereto as Exhibit 5 is a true and correct copy of transcript excerpts from the April 27, 2021 deposition of Teva employee Claire Lyons.
7. Attached hereto as Exhibit 6 is a true and correct copy of transcript excerpts from the April 14, 2021 deposition of Teva former employee and Rule 30(b)(6) designee Daniel Barreto.
8. Attached hereto as Exhibit 7 is a true and correct copy of transcript excerpts from the March 21, 2022 deposition of Zhejiang Huahai Pharmaceutical Co., Ltd.'s expert David L. Chesney.
9. Attached hereto as Exhibit 8 is a true and correct copy of an email exchange between Teva employees about the FDA's November 2018 Warning Letter to Zhejiang Huahai Pharmaceutical Co., Ltd. (TEVA-MDL2875-00067084).
10. Attached hereto as Exhibit 9 is a true and correct copy of Teva deposition exhibit 230 showing, inter alia, corporate history/relationships between Teva and predecessor entities Actavis and Watson.

By: /s/ David J. Stanoch
David J. Stanoch
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Dated: March 13, 2023